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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DOV FERSHTADT,	:	
	:	07 Civ. 6963 (CM)
Plaintiff,	:	
	:	
-against-	:	
	:	PLAINTIFF'S RULE 26(a)
VERIZON COMMUNICATIONS INC.,	:	DISCLOSURES
THE PLAN FOR GROUP	:	
INSURANCE, METROPOLITAN LIFE	:	
INSURANCE COMPANY, and UNUM	:	
LIFE INSURANCE COMPANY OF	:	
AMERICA,	:	
	:	
Defendants.	:	
-----	x	

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiff, to the best of his knowledge, and based on information at this junction, discloses the following:

I. PERSONS MOST LIKELY TO HAVE RELEVANT INFORMATION

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II. DOCUMENTS AND MATERIALS

The Plan for Group Insurance, effective January 1, 2002, with amendments, April 29, 2005; The Eyes on VZ Benefits Healthcare and Insurance summary plan description ("SPD"), April 1, 2004; Documents sent by Plaintiff and received by the Verizon Claims Review Unit and the Verizon Benefits Center that are contained in Hewitt's Imaging Database; correspondence between Plaintiff and Defendants; correspondence between Plaintiff's counsel and Defendants; the Claim File maintained by Unum Provident ("Unum Provident"), as of 12/15/05, as provided by Unum Provident; Dr. Edward Stephens' medical records; Dr. Lloyd Gilden's medical records; Dr. Joseph A. Hirsch's medical records; Verizon Summary Plan Description, as of January 2005; Bell Atlantic Long Term Disability Plan for Management Employees, as of January 1, 1998; Verizon Summary Plan Description, as of January 2004; 2004 Benefits Confirmation Statement; Eyes on VZ Benefits, as of January 1, 2002; 2002 Annual Enrollment Confirmation Statement; Eyes of VZ Benefits, as of January 1, 2005; Defendants' email communications previously produced to Plaintiff; Hewitt Call Recording Request, previously produced to Plaintiff; The Plan for Group Insurance, as of January 1, 2002; tape recordings of conversations between Plaintiff and various of Defendants.

III. COMPUTATION OF DAMAGES

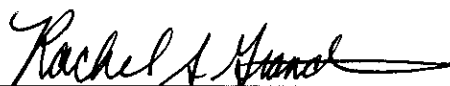
- Recoupment of Dov's full benefits, namely 66⅔% of his pre-disability earnings, tax free, with an \$11,111 monthly cap, retroactively to the first date to which he was entitled to LTD Benefits, and prospectively;
- An amount in excess of \$500,000 as consequential damages resulting from Verizon's and MetLife's actions, which have caused (1) the symptoms of Dov's disabling illnesses and conditions to severely worsen, and (2) Dov to suffer increasing loss of concentration and memory, and increasing anxiety and depression;
- Attorneys' fees and costs.

IV. INSURANCE AGREEMENT

Not applicable.

Dated: New York, New York
August 1, 2008

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By: 
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